

EXHIBIT A

Morgan Lewis

Elisa P. McEnroe

Partner

+1.215.963.5917

elisa.mcenroe@morganlewis.com

July 13, 2018

VIA E-MAIL

Mark Pifko

Baron & Budd

Encino Plaza

15910 Ventura Boulevard, Suite 1600

Encino, CA 91436

Re: In Re: National Prescription Opiate Litigation, Case No. 17-md-2804
Rite Aid of Maryland, Inc. Document Production Weekly Update

Counsel:

Pursuant to Special Master Cohen's request earlier this week, we write with an update on discovery from Rite Aid of Maryland, Inc. ("Rite Aid"). Rite Aid timely responded to the interrogatories and document requests on July 5. The next day, Friday, July 6 after 8 p.m. Eastern, you told us that "Rite Aid's responses to the Requests will be addressed in a separate letter . . ." The next day, we responded asking for a time to meet and confer this week, but have not heard back. Nor have we gotten a letter. We continue to look forward to the opportunity to meet and confer.

In the meantime, Rite Aid has been working to identify appropriate document custodians and to conduct a collection and review of documents in advance of production.

We also are in receipt of a letter from Paul Farrell, Jr. dated July 11 purporting to identify certain individuals as fact witnesses, even though we have not received any fact witness notices. Please let us know whether we should expect deposition notices for the witnesses identified in Mr. Farrell's letter and, if so, when.

Further, we have seen the "Combined Discovery Requests" that Plaintiffs circulated earlier this month. Before that, Plaintiffs had already served 35 interrogatories and 35 document requests on Rite Aid. CMO 1 limits plaintiffs to serving 35 requests for production and 35 interrogatories on each Defendant Family. *See* CMO 1 Section 9.I.1. Accordingly, Rite Aid will not be responding to the new additional requests that exceed the limits.

Morgan, Lewis & Bockius LLP

1701 Market Street
Philadelphia, PA 19103-2921
United States

T +1.215.963.5000
F +1.215.963.5001

Mark Pifko
July 13, 2018
Page 2

Along the same lines, Mr. Farrell's July 11 letter contained another list of 13 categories of documents being sought. We do not consider those to be validly-lodged requests and will not be responding further.

We look forward to continued discussions with you and will provide a further weekly update next Friday.

Very truly yours,

A handwritten signature in blue ink, appearing to read 'Elisa P. McEnroe', with a long, sweeping horizontal line extending to the right.

Elisa P. McEnroe

/apg